

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

DANIELLE KITCHIN and DANA B. KITCHIN, Co-Personal Representatives and heirs of the ESTATE OF DANA A. KITCHIN, Plaintiffs, v. RANDALL LIBERTY, et al.	Docket No. 1:18-cv-00356-JDL
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**UNOPPOSED MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL
AS TO CORRECTIONAL HEALTH PARTNERS DEFENDANTS**

NOW COME PLAINTIFFS and file this Unopposed Motion to Extend Time to file the Stipulation of Dismissal against the Correctional Health Partners Defendants by 30 days for the following reasons:

1. Plaintiff's are required to file Stipulations of Dismissal by March 11, 2020. However, they have not perfected their settlement as to the Correctional Health Partners defendants, who are: Correctional Health Partners, LLC, Stephen Krebs, M.D., Jennifer Mix, M.D., Anne-Marie Ulrich and Carmen Mulholland ("CHP Defendants"). Counsel does not anticipate any difficulties in completing the settlement inside of the next 30 days.

2. CHP Defendants have no opposition to this Motion to Extend Time to File the Stipulation of Dismissal as to them by 30 days.

WHEREFORE, the Undersigned requests this Court extend Plaintiff's deadline to file the stipulation of dismissal against the CHP Defendants by 30 days.

Dated this 11th day of March 2020 in Portland, Maine.

Respectfully Submitted,

/s/ Timothy E. Zerillo, Esq.
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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby filed foregoing the Motion to Extend Time To File the Stipulation of Dismissal as to the CHP Defendants on all parties via the ECF system.

Respectfully Submitted,

/s/ Timothy E. Zerillo, Esq.
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